

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

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JOHNNY M. HUNT, :
: Plaintiff, :
: :
: -against- : Case No. 3:23-cv-00243
: :
SOUTHERN BAPTIST CONVENTION, :
GUIDEPOST SOLUTIONS LLC, and :
EXECUTIVE COMMITTEE OF THE SOUTHERN :
BAPTIST CONVENTION, :
: Defendants. :
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**FED.R.CIV.P. 26(A)(1) INITIAL DISCLOSURES OF
DEFENDANT GUIDEPOST SOLUTIONS LLC**

Defendant Guidepost Solutions LLC (“Guidepost”) makes the following initial disclosures (the “Disclosures”) pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Guidepost provides the Disclosures to the best of its knowledge and on the basis of the information available as of this date. Guidepost reserves the right to alter, amend, supplement, augment, or otherwise change the Disclosures as appropriate. No response or lack of response herein shall be understood to limit the legal theories, factual contentions, or evidence to be employed, relied upon, or presented by Guidepost during any proceeding in this case.

Initial Disclosure (A)(i):

Guidepost identifies the following individuals likely to have discoverable information (along with the subjects of that information) that may be used to support its claims or defenses:

Name	Subjects
Samantha Kilpatrick, Sr. Managing Director, Guidepost	<ul style="list-style-type: none">• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses• Guidepost's drafting, editing, and finalization of the relevant portion of the Report
Russell Holske Jr., Sr. Managing Director, Guidepost	<ul style="list-style-type: none">• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses• Guidepost's drafting, editing, and finalization of the relevant portion of the Report
Julie Myers Wood CEO, Guidepost	<ul style="list-style-type: none">• Guidepost's structure, operations, policies, and procedures• Scope of SBC's engagement of Guidepost
Krista Tongring, Sr. Managing Director, Guidepost	<ul style="list-style-type: none">• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses• Guidepost's drafting, editing, and finalization of the Report
Johnny M. Hunt	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff• Guidepost's investigation of Complainant's allegations against Plaintiff• Plaintiff's claims in this action
Complainant	<ul style="list-style-type: none">• Allegations against Plaintiff• Guidepost's investigation of allegations against Plaintiff
Complainant's Husband	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff• Guidepost's investigation of Complainant's allegations against Plaintiff
Roy Blankenship	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff• Communications with Plaintiff, Complainant, and Complainant's Husband• Guidepost's investigation of Complainant's allegations against Plaintiff
Witness 1	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff
Witness 2	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff

Witness 3	<ul style="list-style-type: none"> • Complainant's allegations against Plaintiff
Janet Hunt	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Jim Law	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Kevin Ezell, President, NAMB	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Anna Gage	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Christopher Lee	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Matt Lawson	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Mark Hoover	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Mike Whitson	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Steven Kyle	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Benny Tate	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Members of the SBC Executive Committee	<ul style="list-style-type: none"> • Facts regarding the scope of the Report as it concerns Plaintiff
Bruce Frank	<ul style="list-style-type: none"> • Information regarding SBC's engagement of Guidepost • Facts regarding the scope of the Report as it concerns Plaintiff
Rolland Slade	<ul style="list-style-type: none"> • Information regarding SBC's engagement of Guidepost • Facts regarding the scope of the Report as it concerns Plaintiff
John E. Carswell	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Eddie Carswell	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Pete Hixson	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant

John E. Carswell III	<ul style="list-style-type: none"> Plaintiff's communications regarding Plaintiff's encounter with Complainant
Shane Pruitt	<ul style="list-style-type: none"> Plaintiff's communications regarding Plaintiff's encounter with Complainant

Initial Disclosure (A)(ii):

Guidepost identifies the following documents in its possession, custody, or control, among others, that may be used to support its claims or defenses:

- Documents related to SBC's engagement of Guidepost
- Documents collected or generated during Guidepost's investigation of Complainant's allegations against Plaintiff, including notes and recordings pertaining to said allegations

Initial Disclosure (A)(iii):

Not applicable

Initial Disclosure (A)(iv):

Guidepost identifies the following insurance agreements or other agreements to satisfy all or part of a possible judgment in this action or to indemnify or reimburse Guidepost for payments made to satisfy such judgment: SBC Engagement Agreement, Section 5.1.

Dated: Nashville, Tennessee
New York, New York
June 22, 2023

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via electronic mail on the following:

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on this 22nd day of June, 2023.

s/Katharine R. Klein